Postal Regulatory Commission Submitted 7/9/2012 4:16:21 PM Filing ID: 83507 Accepted 7/9/2012

# Before the POSTAL REGULATORY COMMISSION WASHINGTON, DC 20268-0001

Post Office Structure Plan

Docket No. N2012-2

ADDENDUM TO
PUBLIC REPRESENTATIVE NOTICE OF INTENT
TO CONDUCT ORAL CROSS-EXAMINATION
(July 9, 2012)

On July 6, 2012,, the Public Representative submitted notice of intent to conduct cross-examination of Postal Service witness Day. On July 9, 2012, the attached document was posted at <a href="http://postalnews.com/postalnewsblog/">http://postalnews.com/postalnewsblog/</a>. The Public Representative expects to refer to this document during oral cross-examination.

Respectfully submitted,

Emmett Rand Costich
Public Representative N2012-2

901 New York Ave, N.W. STE 200 Washington, DC 20268-0001 (202) 789-6833; Fax (202) 789-6861 rand.costich@prc.gov

#### HR FREQUENTLY ASKED QUESTIONS

## POSTPlan Implementation – PMR Opportunity

These FAQs reflect questions that were submitted by Area and Field HR personnel, regarding POSTPlan Implementation.

- 1. It was shared by Operations that the pay structure for Level 2 & 4 offices will be \$11.76 per hour. Do we have the flexibility to offer PMR positions at the lower rate of \$9.45 as previously offered?

  Yes, you can continue to hire PMRs at whatever local rates that you are able (even below \$11.76), if these PMRs are not in the POSTPlan office. If they are in the POSTPlan office, they have to be hired at \$11.76.
- 2. Are the PMR's not currently making the \$11.76 salary being adjusted to this new pay rate? If so, when?

  No. Only PMRs hired as part of the POSTPlan offices will have the \$11.76 salary. We will not adjust any other salaries.
- 3. PMR's currently making over the \$16.80 rate; will they continue to be authorized at this rate? If not have we considered MSPB rights with the rate being adjusted down?
  - Under the POSTPlan, we will NOT reduce salaries.
- 4. Will the Area's continue to have the authority to grant exceptions to salary up to \$16.80? (Western Area has concerns with the Bakken Oil Field area in North Dakota which covers 25,000 miles as an example. Salaries are inflated due to this oil exploration and drilling).
  - At this time, salary exceptions at the Area level are not allowed. HQ Compensation will identify an exception process for senior management's approval. Once approved, it will be communicated to the Areas.
- 5. What is the guidance regarding leave for POSTPlan PMRs?
  - Under the POSTPlan, PMRs are entitled to one hour of leave to every 20 hours in pay status per pay period. This is similar to the provision for PSEs and NALC temporary employees (TEs). This applies to all PMRs, even those not in POSTPlan Offices. This is expected to be in effect the first pay period of the next fiscal year (October 6th). We believe this to be around the time for the POSTPlan to begin to take place. Re-employed Annuitants will not earn any leave.
- 6. Will job descriptions for PMR's be updated for postings?
  - Yes. A review of the job description is currently in progress and may also require a new occupation code.
- 7. Without new Occ Codes, how will the eCareer Requisition populate with the correct salaries?
  - The Salary field in eCareer for PMR external postings is populated by the processor and is an editable field allowing for input of the correct hourly rate.
- 8. What guidance is available to start posting for PMR positions now?

  Current PMR vacancies can be posted now and are not affected by potential new position descriptions and Occ codes for POSTPlan PMRs.
- 9. Do we have a listing of offices that will be level 2, 4 and 6 by District?
  - The listing of all level 2, 4, and 6 POSTPlan offices are available now on CSDC on the Blue Page http://csdc/post/post.html

10. Will a level 6 PTPO have a PMR? If yes, will they work Saturdays or will the PTPM be required to work 6 days a week? If no, who will cover for absences?

The 6-hour PTPO will have a PMR to provide coverage when the Postmaster is non-scheduled or absent.

11. Recently upgraded level 18 PMs will have to terminate their PMR, what will be the effective date? Will consideration be given to allow them to lateral into a PSE position or does the office have to utilize eCareer to locate a replacement?

Per confirmation from Labor Relations, the PMRs in the Level 18 offices are to remain until further notice. A PMR cannot "lateral" into a PSE. PSE positions must be filled competitively in accordance with the Collective Bargaining Agreement.

12. Are the PMRs for the 11's & 13's eligible to apply for the same office when upgraded to Level 18 and 6 hr. office vacancies? I know they are not career, but do you know of any plans to allow them to be eligible to apply?

A PMR in an office scheduled to change to a Level 18 or career 6-hour office will likely remain as the PMR for coverage on Saturdays and when the Postmaster is absent.

13. In the smaller level offices, PMRs were previously allowed to apply for PM vacancies in their office. What flexibility is there to apply for future PM postings?

Current policy in Handbook EL-312, Section 743.14 states "*EAS-16 and below postmaster* - Postmaster relief/leave replacements (PMR/LRs) may apply and compete for postmaster vacancies within their district. When the PMR/LR applies for his or her Post Office, the PMR/LR must be considered by the selecting official at that Post Office.'

14. Has the eligibility been established for the career 6 hr. offices?

This question may refer to "eligibility related to the Postmaster position" or "eligibility related to the PMR position." Eligibility for the Postmaster position in the career 6-hour offices will be a permanent assignment through the current EAS posting/selection procedures. After the completion of the limited area of consideration posting/selection cycles, consideration will be given to current postmasters' requests for non-competitive placement into the 6-hour offices as a lateral or change to lower level.

The 6-hour career post offices are eligible to have a PMR for coverage in the absence of the Postmaster.

15. If a Post Office was approved to close and the Postmaster lateralled to another EAS-15 same level office and now the EAS-15 office, scheduled to close, goes to a Level 18; is there any consideration to cancel the lateral action and allow that Postmaster to return to that same office in the upgraded level?

The lateral action cannot be cancelled if a Form 50 has already been processed. If the form 50 has been processed and the Postmaster has been lateralled out, the action continues and will not be cancelled. If the 50 has not been processed, then the Postmaster can stay in the office being upgraded.

16. Can we modify a PMR Form 50 who only works at one office to include working at other offices?

Yes, current policy and Form 50 process allow for Dual PMRs to have more than one Form 50. There is a limit to not exceed four offices.

Current policy and Form 50 processing allows for up to four (4) Dual Appointments which include acceptable PMR dual combinations. Assuming all dual appointments are to a PMR position, an employee may have up to four (4) Form 50s as a PMR.

17. If a PMR is going to work in multiple offices, how will the travel between offices be charged?

Travel charges between offices will be reviewed on a case-by-case basis in accordance with the FLSA and ELM 438.123

18. A retired Postal Service applicant can serve as a TRC or PMR/LR for a period limited to 180 days in a calendar year without an offset to his or her annuity under a dual compensation waiver granted by the Office of Personnel Management. Will this be modified to include PSE's coded as an 818, as these PSEs are comparable to a PMR?

No. There are no plans to modify this authority to include PSEs.

19. Will we receive an SOP for addressing the filling of lower level offices that are currently vacant?

The telecom discussion held with Area and District HR representatives on June 13th & 14th provided the procedures for filling PMR positions in the lower level offices. The presentation "PMR Selection" is posted on the OE/Hiring & Placement webpage, under the sub-heading: *Hiring Annuitants as TRC or PMR/LR*.

Further discussions have been held with the Delivery Field Performance Team regarding the POStPlan approach. A document outlining the guidance on filling postmaster vacancies and relief positions will be developed for dissemination to Area Human Resources.

20. If there's currently a career clerk serving as an OIC in an office being reduced to a Level 2 or 4, at what point would we have to staff that office with a non-career employee?

Non-career staffing will not occur until the office officially becomes a POSTPlan office with level reduction. The PRC advisory opinion is expected August 23rd. Once the opinion comes back, Dean Granholm will lead the POSTPlan phased implementation. The POSTPlan implementation is expected to begin at the rate of approximately five offices per District, per week, starting with the vacant offices. The survey to the community will be done first, the survey results will be received, and then community meetings will be scheduled. The District Manager designee will go on site for the community meeting, they will receive the community's feedback and recommendations regarding which path they want to take based on the three available paths. If the chosen path is the POSTPlan, Dean will work with the District to establish the level 2, 4, or 6 conversion date for the offices.

21. Is EL-312, Section 743.17, c. still in effect? (Newly appointed postmasters may not be reassigned or appointed to another position in the Postal Service until one year has elapsed from the date of appointment as a Postmaster).

No. The one year restriction was eliminated per policy memo, dated July 5, 2007 – subject: *EAS Eligibility – Changes in Policy.* This memo will be redistributed to the Area HR Managers. Section 743.17 of EL-312 will be revised. This restriction was eliminated in 2007.

22. Are Postmasters, who are impacted by POStPlan, and are successful in getting a promotion to EAS-18, entitled to relocation benefits?

Postmasters impacted by POStPlan who compete and are awarded a position that results in a promotion for them may be eligible to receive relocation benefits. If relocation benefits are offered on the job posting, or if they are authorized by the hiring manager, the employee must still meet all eligibility requirements to receive the benefits.

23. If a PMR position cannot be filled under a Dual Compensation waiver, and an NDAA is posted and it is still not filled, can it revert back to a Dual Compensation waiver?

Normal recruitment methods have to be attempted and exhausted before the dual compensation waiver may be used to reemploy an annuitant without offset into the PMR position. If an annuitant is interested and available but is or has already been reemployed in a PMR or TRC position this calendar year and will exceed the 180-day limit if reappointed to the PMR vacancy, then a request may be made to reemploy the annuitant under NDAA instead. Similarly, if an annuitant is or was reemployed this calendar year as a TRC or PMR and wishes to be

reemployed in a different PMR position, a new appointment under the dual compensation waiver can be given as long as normal recruitment methods to fill the PMR vacancy have been attempted and exhausted and the 180-day limit within the calendar year is not exceeded.

Under the "Dual Compensation Waiver," the limitation is on work days, i.e., any day during which a PMR performs any work, no matter how brief, counts toward the 180-day annual limit. The NDAA waiver, on the other hand, has a limit tied to work hours, not days.

#### 24. Can NDAA be invoked to appoint PMRs?

Yes, under NDAA the PMG would have to certify that filling the PMR position is critical to operations of the Postal Service before an annuitant could be reemployed without offset to a PMR position.

### 25. After Dual Compensation, can NDAA be invoked?

Yes, this is a viable option. However, the limitations of each authority would have to be met. If an annuitant reemployed as a PMR is nearing the 180th work day in the calendar year, the annuitant can be reemployed as a PMR under the NDAA authority without offset as long as the PMG can certify that filling the PMR position is critical to operations of the Postal Service.

#### 26. How many times can dual compensation be used?

There is no stated limit on the number of appointments into which an annuitant can be reemployed without offset under the dual compensation waiver as long as the other conditions are met. However, the authority to grant dual compensation waivers under the NDAA ends in late 2014 absent congressional action to reauthorize or extend the authority.